

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13
Angela Maria Velazquez :
Debtor : BANKRUPTCY NO.: 18-17661 ELF

RESPONSE TO MOTION FOR RELIEF

Debtor, by her attorney, Brandon Perloff, Esq., by way of Response to Movant's motion, respectfully represents the following:

1. -2. Admitted.
3. Neither admitted, nor Denied. Movant's averment contains facts, which are contained in documents on record before the Court. Said records speak for themselves, and the Debtor cannot speak to the veracity of said documents.
4. Admitted.
5. Admitted.
6. Denied. By way of further response, the Debtor's Chapter 13 Plan does not require direct payments to the movant. Debtor's plan is a total debt plan which pays off the entire remaining mortgage balance within the plan. See §4(b) of Chapter 13 Plan (Doc #2).
7. Denied. By way of further response, the Debtor objects to the relief requested by the Movant.
8. Denied. By way of further response, the Debtor's Chapter 13 Plan does not require direct payment to the movant.
- 9.-10. Denied. The averments set forth in this paragraph is denied to the extent that they contain conclusions of law to which no response is necessary.

WHEREFORE, Debtor pray that the Movant's request for relief be denied.

Respectfully submitted,

Date: 3/8/2019

/s/ Brandon Perloff
Brandon Perloff Esquire.
Attorney for Debtor